

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
THE BASU GROUP INC.,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	16-cv-00461-PGG
v.	:	
	:	
SEVENTH AVENUE, INC.	:	<u>JURY DEMANDED</u>
	:	
Defendant.	:	
-----X		

DEFENDANT'S CUMULATIVE APPENDIX IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT AND IN OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

PAGES 1482-1528

1 Q. All right.

2 A. So that's not a part of the element.

3 Q. But there is space, and in peacock
4 feather four, on the left side of that central
5 peacock feather you described, the outer most branch
6 directly abuts another peacock feather; correct?

7 A. Well, this photograph in exhibit two
8 shows an image of a single peacock feather, whereas
9 the image that you see in exhibit seven, and it's
10 referred to as peacock feather four in this exhibit,
11 that is three peacock feathers placed next to each
12 other to create a story, create an artwork which is
13 based on our imagination or interpretation of a
14 story that we're trying to create for our handbag
15 using a central element that we created. That
16 element is the peacock feather and that is the key
17 subject of the story that we are building on our
18 bag.

19 Q. But that central peacock feather has
20 no space to its left?

21 MR. GILMAN: Objection.

22 A. In this interpretation, we decided --
23 like to create this artwork, we decided to place
24 another peacock feather right next to it where we
25 continued to maintain the same look and feel for

1 each of our feathers.

2 Q. And graphically the peacock feather
3 next to the center one is touching it?

4 A. Yes. The two peacock feathers are --
5 I would say they're more like overlapping each other
6 in the way we have tried to draw them.

7 Q. But two dimensionally the lines
8 touch?

9 A. Yes, they do.

10 MR. BREZINA: I'm going to ask the
11 reporter to mark as exhibit eight documents
12 beginning with TBG 9.

13 Counsel, this one is black and white.
14 I won't ask about colors.

15 MR. GILMAN: Oh.

16 MR. BREZINA: I'm not even sure if
17 the one you produced had colors, but this is what
18 I've got.

19 MR. GILMAN: I think all the bags
20 did.

21 MR. BREZINA: Yeah.

22 MR. GILMAN: Pretty sure, but not the
23 letters obviously, I don't think.

24 MR. BREZINA: All right. Let's just
25 talk about the letters.

Defendant's Exhibit 13

ANUSCHKA

Painted with Passion



*This lifestyle is being used for illustrative purposes only and should not be considered as an endorsement by the model.

Def. Cumul. App'x 1485
2012

The Five Stages to Crafting Designer Anuschka Accessories

BEWARE OF COUNTERFEIT.

See page 34 for details.



1. Anuschka leather accessories are carefully hand cut and exquisitely hand crafted from fine grain cowhide.



2. Our Quality team conducts meticulous production checks through all stages of fabrication.



4. After each bag has been individually hand painted, it is inspected again to ensure that our high quality standards have been met.



5. A family member personally signs 'Anuschka' on each accessory as a reflection of our commitment towards the highest standard of quality before it leaves our work-shop.



3. Our trained artisans sketch each piece before painting the entire bag with exotic and original Anuschka art.

Def. Cumul. App'x 1486



257 AT



257 PRA



257 SSW



257 DNP (NEW)

SMALL ASYMMETRIC FLAP BAG - \$177.00

Magnetic snap closure. Front zip pocket under flap. 1 zippered compartment. Inner zip pocket. Adjustable shoulder strap. 20" handle drop. 8.5"x7.5"x3"



349 AC



349 PKL (NEW)



349 AGW



349 HFL



349 TRB

SMALL MULTI COMPARTMENT ALL-ROUND ZIP - \$172.00

All-round zip entry. 4 open compartments with 1 zippered partition pocket. Inner zip pocket. Front zip pocket & rear open pocket. Sling handle with 21" handle drop. 10.5"x7"x2.5"

Def. Cumul. App'x 1487



357 AT



357 PFS



357 PKF



357 PS



357 PRA

MEDIUM V-TOP HOBO - \$197.00

Two top zip entry compartments. 1 magnetic snap entry compartment. 1 small open pocket and 1 vertical zip pocket in front. Inner zip pocket. Adjustable shoulder strap. 14.5" handle drop. 10.5"x10"x2"



382 AC



382 COL



382 PFS

CLASSIC HOBO WITH SIDE POCKET - \$190.00

Top zip entry. Inner zip pocket & multi-purpose pocket. Rear zip pocket. Two, open deep side pockets. Wide shoulder strap. 11.5" handle drop. 9"x8.25"x4.75"

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371 AT



371 PHA



371 LPD



371 PKF

MEDIUM TOP-ZIP HOBO - \$179.00

Top zip entry. Inner zip pocket. Multi-purpose pocket. Rear zip pocket.
Short handle with 11" handle drop. 12"x6.25"x4"



412 PKS



412 PRA



412 TGR



412 OPEN VIEW

MINI SLING ORGANIZER - \$185.00

Flap over entry with magnetic closure. Expandable gusset opens wide to two compartments and a zippered partition pocket. Inside 8 CC pocket. Detachable shoulder strap. 5"x6"x2.5"



419 TGR



419 HBF



419 PKF

EXTRA LARGE SHOPPER - \$529.00

Top zip entry. Inside zippered wall pocket, cell and multipurpose pocket.
Rear zip pocket. Handle drop 9.5". Metal feet at base. 19"x14"x4.5"



421TRL

LAPTOP ORGANIZER - \$428.00

All round zip entry. Inside zippered back wall pocket. 3 full length gusset pockets. ID and pen holders. Cell and multipurpose pockets. Removable padded laptop cushion. Front gusset pocket with magnetic flap entry. Inside pullout CC holder. Metal feet at base. Handle drop 12.5". 15.75"x12"x3.25"



426 COL

MULTI POCKET CONVERTIBLE SHOPPER - \$495.00

Flap open entry with magnetic closure. Inside zippered wall pocket. One wide open wall pocket, cell and multipurpose pocket. Front has two small flap pockets with magnetic closure. Two large flap pockets, with push lock closure. Small handle drop 5". Detachable shoulder strap. Metal feet at base. 16.75"x11"x4.25"



430 PKS



430 MST

TWIN TOP STUDDED SHOPPER - \$378.00

Double zip entry to two large compartments. Inside front wall has cell and multi-purpose pocket. Rear zip pocket. Handle drop 12.25". Metal feet at base. 14.25"x9.25"x4"



432 AS



432 HBF



432 PKS



432 WHA



432 JPP

MEDIUM ASYMMETRIC FLAP BAG - \$241.00

Top zip entry under magnetic flap closure. Front zip pocket under flap. Inside zippered wall pocket, cell and multipurpose pocket and key holder. Rear zippered pocket. Adjustable shoulder strap. 20.5" to 22.5" handle drop. 10.5"x9.5"x3.75"

Testimonials

"I started my obsession with Anuschka handbags maybe 2 weeks ago. I purchased two of them. One vintage Abstract and a newer Abstract Twilight. You cannot pry them from my hands! I think my next move is the Butterfly collection. My other designer bags have now taken a backseat. The artwork and vibrant colors are just brilliant!" - Laurie M.

"The artwork is gorgeous and original. The quality of the leather and craftsmanship is the best I have ever seen - and I am comparing it to bags at least twice the price. No wonder I am hooked. I just found your leather protection spray which I will be ordering to protect my new Mermaid Tote and the others in my "artwork" collection. Thank you and please keep up the good work!" - Vivian C

Def. Cumul. App'x 1491

Share your experience on [facebook.com/anuschkaleather/](https://www.facebook.com/anuschkaleather/)

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TBG - 179



433 HFL



433 PKF



433 MST (NEW)



433 JPP



433 LMM



433 SSW

CLASSIC HOBO WITH STUDDED SIDE POCKETS - \$215.00

Top zip entry. Inner zip pocket, cell and multipurpose pockets, key holder. Rear zippered pocket. Two open, deep side pockets. Adjustable shoulder strap. 10" to 17" handle drop. 9"x 8.25" x 4.75"



435AGW



435 LPD

SMALL SHOULDER BAG \$175.00

Top zip entry. Inside zippered wall pocket, cell and multipurpose pocket and key holder. Rear zippered pocket. Double rope handle. 9.25" Handle Drop. 13.5"x6.75"x2.5"

Def. Cumul. App'x 1492

Enchanted Forest Fairy-There are thousands of fascinating legends around the world about these fascinating, supernatural creatures. Some believe they are fallen angels while some believe they are wandering souls. We imagined our mythical fairy as a spirit of nature- sitting alone in a magical forest surrounded by enchanted plants and shimmering dragonflies.



Def. Cumul. App'x 1493



436 HBF



436 LMM (NEW)



436 SFS (NEW)

SLIM CROSS SHOULDER BAG - \$177.00

Top zip entry. Inside zippered wall pocket, cell and multipurpose pocket and key holder. Front slip pocket. Rear zippered pocket. Adjustable shoulder strap. 21.5" to 27" Handle Drop. 9"x10.5"



437 COL



437 DNP (NEW)



437 TRL

VINTAGE FOLD OVER SLOUCH - \$250.00

Top entry with dog clip closure. Inside zippered pocket, cell and multipurpose pocket and key holder. Front slip pocket. Rear zippered pocket. Short shoulder strap. Handle drop 9.5". 15.5" x 6.75" x 4.25"

**ANUSCHKA LEATHER PROTECTOR \$15**

The Anuschka Leather Protector™ is a non-silicon and non-CFC based spray which has been specially developed to preserve the rich colors and the suppleness of the leather. It protects the vibrant art while allowing the leather to breathe. Can be used on our unique hand painted leather accessories and any other fine leather items.

Def. Cumul. App'x 1494



440 COL



440 LPD



440 SFS (NEW)

BRAIDED HANDLE LARGE RUCHED HOBO - \$316.000

Wide top entry with double magnetic closure. Inside two zippered pockets, cell and multipurpose pockets, an open pocket and key holder. Double twisted rope handle. 8" handle drop. 21"x9"x4.25"



443 HFL



443 JPP



443 PKF

MINI MULTI POCKET FLAP SATCHEL \$204.00

Top zip entry to central compartment. Two full length outer compartments with magnetic closure. Full length front pocket with magnetic flap closure. Two inside zippered pockets, cell and multipurpose pockets and key holder. Double rope handle. Handle drop 6.5". 12.25" x 5" x 5"

Def. Cumul. App'x 1495